



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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October 24, 1988

Mr. Thomas G. Wardell, Chairman
Uintah County Commission
County Building
152 East 100 North
Vernal, UT 84078

Dear Mr. Wardell:

Re: Response to Uintah County Deficiency Submittal, Asphalt Ridge, M/047/022, Uintah County, Utah.

We have completed our review of your responses, dated October 6, 1988, to our deficiency letter, dated August 26, 1988. Below is a list of these deficiencies:

Page 30 - Reclamation Plan, Soils:

DOGM Recommendation (8-26-88):

Some of the disturbed areas are composed mostly of gray earthen material. This dark soil limits the success of revegetation. The Division recommended the language of this section of the Mining and Reclamation Plan (MRP) be changed to either:

- a) incorporate language committing the operator to the borrowing of topsoil material or substitute material to cover overburden material that is dark or gray in color; or
- b) include an alternative that would permit mulching with native hay at a rate of 4000 lb/acre.

Uintah County Proposal (10-6-88):

Two options are considered by Uintah County:

- a) initiate a test plot on the gray earthen material; or
- b) mulch area R-2 (approx. 7 acres) with 16,000 lbs. hay.

DOGM Requirement (10-24-88):

Similar dark areas are expected on the other areas, not just area R-2. The language in the MRP must address all areas. A test plot in area R-2 is an acceptable proposal; however, the results of this test plot will determine the revegetation methods used for the remaining areas. If mulch is to be used on these difficult areas, the rate must be no less than 3000 lb/acre, and diammonium phosphate fertilizer (18-46-0) must be applied at 200 lb/acre, at the time of mulching. The MRP should also reflect this.

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Page 31 and 32 - Reclamation Plan, Seed Mixtures:

DOGM Recommendation (8-26-88)

To increase success probability of initial revegetation, the Division recommended the following seed mixtures:

Seed Mixture #1 Pure Live Seed/lb

Grasses:

Thickspike Wheatgrass	3
Streambank Wheatgrass	3
Crested Wheatgrass	2
Russian Wildrye	3

Forbs:

Cicer Milkvetch	1
Yellow Sweet Clover	1

Total = 16 lbs

Seed Mixture #2

Pure live Seed/lb

Grasses:

Crested Wheatgrass	2
Thickspike Wheatgrass	3
Indian Ricegrass	3
Russian Wildrye	3

Forbs:

Cicer Milkvetch	1
Yellow Sweet Clover	1

Total = 13 lbs

Seed Mixture #3

Shrubs:

Four Wing Saltbrush	3
Winterfat	2
Rabbitbrush	.75

Total = 5.75 lbs

Uintah County Proposal (10-6-88)

Seed Mixture recommendation is acceptable.

DOGM Requirement (10-24-88)

The MRP must reflect changes in seed mixture.

Page 33 - Reclamation Plan, area R-2:

DOGM Recommendation (8-26-88)

We recommended the area R-2 be graded to a more rolling topography, and that it is be retopsoiled (with substitute topsoil material) prior to seeding. At a minimum, the sediment pond at the base of R-2 should be adequately sized to contain the projected runoff volume from a 10 yr-24 hr storm event. Runoff should be channeled gradually into the pond.

Uintah County Proposal (10-6-88)

The area will be contoured to a more rolling topography. Import material will not be used.

The sediment pond will be adequately sized to contain runoff from a 10 yr-24 hr storm.

DOGM Requirement (10-24-88)

After contouring the area, a revegetation test plot will be constructed to determine success on gray earthen material. This will depend on the County's option to either mulch the area, or construct a test plot.

The MRP language must indicated this, along with the designed sediment pond map. An as-built drawing of the sediment pond must be furnished to the Division when the pond is completed.

Page 35 - Reclamation Plan, R-3

DOGM Recommendation (8-26-88)

The Division recommended grading to a 3H/1V configuration. A 2H/1V configuration will decrease revegetation success.

Uintah County Proposal (10-6-88)

The likely configuration of the slopes will be between 3H/1V and 2H/1V. The County argues that CHEVRON has been successful with 2H/1V revegetation.

DOGM Requirement (10-24-88)

The MRP language must indicate that the maximum slope not exceed 2H/1V. If erosion becomes a problem, subsequent slope configurations will be a 3H/1V maximum.

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Page 38 - Reclamation Plan, Area R-5

DOGM Recommendation (8-26-88)

Upon cessation of mining operations, the operator plans to construct a berm on the southern boundary of the pit. This berm is intended to prevent property water flow from affecting the adjacent AROC property. The Division recommended the operator work out an agreement with AROC, requiring AROC to remove berm upon AROC's cessation of mining operations.

Uintah County Proposal (10-6-88)

The County has initiated discussions with AROC concerning this issue.

DOGM Requirement (10-24-88)

The MRP language must indicate that AROC has accepted this obligation. A letter from AROC confirming this agreement must be submitted as an Exhibit to the MRP.

Page 13, 14 - Variance Request

DOGM Requirement (8-26-88)

The following requests for variance were granted:

- M-10 (3) Impoundments,
- M-10 (5) Highwalls,
- M-10 (8) Roads and Pads

The requested variance M-10 (14) Soils, is granted for previously disturbed areas. Future disturbance will require topsoil removal and storage, except in excessively steep terrain, where soil removal would be impractical.

Page 23 - Mining Plan, Alternative 2 & 3

DOGM Requirement (10-24-88)

The two proposed drill holes fall within the MRP boundaries, and will not need to be processed under a separate Notice of Intention to Commence Exploration.

Page 14 - Surety

DOGM Requirement (10-24-88)

A Board Contract will be required prior to the Division granting final approval. This self-bond requirement has already been recommended to and approved by the Board of Oil, Gas and Mining.

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Overall, the initial MRP, submitted on May 2, 1988, is very good. As Scott Johnson stated to Nyle Bigelow and Rob Hugie during his October 13, 1988 field visit, your operation has been given tentative approval and you may continue with mining and on-going reclamation activities. Final approval will be granted when all of the additions and stipulations referenced to in this letter are addressed to the satisfaction of the Division.

If you are still opposed to the surety arrangement required, please contact Marjie Anderson of this office to make arrangements to appear before the Board of Oil, Gas and Mining. Should you have questions concerning other material referenced to in this letter, contact Scott Johnson.

Sincerely,



Lowell P. Braxton
Administrator
Minerals Development and
Reclamation Program

jb

cc: Marjie Anderson
Wayne Hedberg
Scott Johnson
Holland Shepherd
MN18/17-21